

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION

Peacock Automotive, LLC)	
)	
Plaintiff,)	Case No: <u>9:20-cv-1303-BHH</u>
)	
vs.)	
)	
Granite State Insurance Company,)	DEFENDANT GRANITE STATE
)	INSURANCE COMPANY'S NOTICE OF
Defendant.)	REMOVAL
)	

Granite State Insurance Company ("Defendant"), files this Notice of Removal to the United States District Court for the District of South Carolina, Beaufort Division, pursuant to, *inter alia*, 28 U.S.C. §§ 1332, 1441, and 1446. National Union would respectfully show this Honorable Court:

1. This action was brought in the Jasper County, South Carolina, Court of Common Pleas, case 2020-CP-27-00101, on March 4, 2020.

2. Defendant was served with the Complaint through the South Carolina Department of Insurance on March 6, 2020. A copy of the filed Complaint is attached hereto as Exhibit "A".

3. South Carolina Department of Insurance accepted Service on behalf of Granite State Insurance on March 6, 2020 and mailed the Summons and Complaint to Granite State Insurance via Certified Mail Return Receipt Requested on March 9, 2020. An un-clocked copy of the letter from the South Carolina Department of Insurance and Notice of Service of Process is attached hereto as Exhibit "B".

4. According to the Complaint, Plaintiff is a Florida limited liability company organized under the laws of the state of Florida.

5. Defendant is an Illinois company with a principal place of business in New York.

6. This case is removable to federal court pursuant to 28 U.S.C. § 1441 as this court has original jurisdiction over this action under 28 U.S.C. § 1332 in that there is complete diversity of citizenship between the parties.

7. Upon information and belief, the matter in controversy exceeds the sum or value of \$75,000.00, exclusive of interest and costs.

8. Defendant has at this time filed a copy of this Notice of Removal in this action with the Clerk of Court for Jasper County, South Carolina, and served counsel for Plaintiff.

WHEREFORE, Defendant prays that this Honorable Court accept this Notice of Removal, that this Honorable Court take jurisdiction of this cause, and that all further proceedings in this cause in the Court of Common Pleas, County of Jasper, State of South Carolina, be stayed.

Respectfully submitted,

COLLINS & LACY, P.C.

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ATTORNEYS FOR GRANITE STATE
INSURANCE COMPANY

April 6, 2020
Columbia, South Carolina